

FairLaw Firm

INVOICE

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Invoice # 752

Invoice Date: 9/16/2025

FairLaw Firm
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To:
Cruz Valdivieso Figuera
[REDACTED]

Brian H. Pollock \$650/hr
Total Hours: 48.42

Amount due
31,473.00

Services

Date	Staff Member	Category	Description	Duration	Total
10/2/2024	Brian H. Pollock Esq.	Draft/review	Draft email to Ms. Perez requesting she file a Satisfaction of Judgment based on the Verified Agreement and the Court's Order thereon; review her response and refusal to do so by email, and then review her longer email response re: what she contends needs to be resolved before the filing of a satisfaction of judgment (which included deducting the amount of the costs judgment awarded to Defendant from the amount payable in fees)	0.80	520.00
10/2/2024	Brian H. Pollock Esq.	Draft/review	Draft a comprehensive responsive email to Ms. Perez to address, on a point-by-point basis, each of the issues she raised in her email	0.50	325.00
10/3/2024	Brian H. Pollock Esq.	Receipt, Review, and Analysis	Receipt and review of email from Ms. Perez re: her refusal to file a Satisfaction of Judgment until the costs judgment to her client is satisfied	0.20	130.00
10/4/2024	Brian H. Pollock Esq.	Receipt, Review, and Analysis	Receipt and review of Notice of Unavailability of counsel for ALL VIP	0.10	65.00
10/17/2024	Brian H. Pollock Esq.	Receipt, Review, and Analysis	Receipt and review of Paperless Order Granting our M/Compel Fact Information Sheets	0.10	65.00
10/31/2024	Brian H. Pollock Esq.	Draft/review	Conduct research and then Draft Motion for Final Judgment, proposed Order, and email to Judge Dimitrouleas enclosing same	3.20	2,080.00
11/1/2024	Brian H. Pollock Esq.	Receipt, Review, and Analysis	Receipt and review of email enclosing letter of objection to Judge Dimitrouleas requesting opportunity to file a response in opposition before issuance of Final Judgment	0.30	195.00
11/4/2024	Brian H. Pollock Esq.	Receipt, Review, and Analysis	Receipt and review of Order Referring Motion for Default Final Judgment to Magistrate Judge Hunt	0.10	65.00
11/4/2024	Brian H. Pollock Esq.	Receipt, Review, and Analysis	Receipt and review of Order re: email from defense counsel to be disregarded	0.10	65.00
11/11/2024	Brian H. Pollock Esq.	Draft/review	Begin to draft motion for sanctions against defense counsel and conduct legal research for same	4.60	2,990.00
11/13/2024	Brian H.	Email	Exchange emails with Ms. Perez re: her client's continued	0.70	455.00

	Pollock Esq.	Communication	attempt to delay and avoid paying me the money she agreed to pay			
11/13/2024	Brian H. Pollock Esq.	Teleconference with	T/c with Ms. Perez's assistant re: the email she sent about her client's request to delay until January to pay \$50,000 only	0.20	130.00	
11/13/2024	Brian H. Pollock Esq.	Draft/review	Receipt, review, and analysis of Defendant's Motion for Extension of Time; then, conduct legal research and draft Response in Opposition to their MET and include arguments that included judicial estoppel	1.90	1,235.00	
11/13/2024	Brian H. Pollock Esq.	Email Communication	Draft, review, and exchange multiple lengthy emails with Ms. Perez re: the requested extension to pay, the outstanding money owed, the failure to resolve same timely, an analysis of why the Defendants are in the current position they find themselves in (failure to timely pay), and making a final offer to them to resolve the pending issue of nonpayment	0.80	520.00	
11/18/2024	Brian H. Pollock Esq.	Draft/review	Conduct legal research and then draft Motion to Show Cause (re: failure to provide Fact Information Sheets with all attachments)	1.20	780.00	
11/18/2024	Brian H. Pollock Esq.	Draft/review	Draft Renewed Motion for Writ of Execution with Renewed Writ of Execution	0.90	585.00	
11/19/2024	Brian H. Pollock Esq.	Receipt, Review, and Analysis	Receipt and review of Writ of Execution issued (as to both Defendants)	0.10	65.00	
11/19/2024	Brian H. Pollock Esq.	Receipt, Review, and Analysis	Receipt and review of Order Referring M/Order to Show Cause	0.10	65.00	
11/19/2024	Brian H. Pollock Esq.	Email Communication	Receipt and review of email from Ms. Perez requesting add'l time to make payment; then, draft a comprehensive response explaining what led up to this point, the missed deadline by her client, and identifying what has been requested to resolve the pending issues	0.50	325.00	
11/20/2024	Brian H. Pollock Esq.	Receipt, Review, and Analysis	Receipt and review of Paperless Order Granting MET to Respond to M/Default Final Judgment	0.10	65.00	
11/27/2024	Brian H. Pollock Esq.	Teleconference with	T/c from Ms. Perez wherein she again contested that the Order was the equivalent of a final judgment subject to execution, that her client signed under duress, and that her client was not required to file a Satisfaction of Judgment, offered to pay \$50k by January 10 (or before), and engaged in further discussions about I had accommodated her client by releasing money I was not obligated to do, how her client breached the agreement, and that her clients became obligated to pay \$149k after the breach; further discussed how she felt I was looking for a "pound of flesh" and that this was "personal", to which I explained it was not personal but business and was simply seeking what we had agreed to based on her clients' breach(es) and the email excuses I received (but never money)	0.50	325.00	
11/29/2024	Brian H. Pollock Esq.	Receipt, Review, and Analysis	Receipt and review of Response in Opposition re: M/Writ of Execution, Order to Show cause, Default Judgment, etc.	0.90	585.00	
12/2/2024	Brian H. Pollock	Draft/review	Conduct legal research, review file materials (including correspondence), and begin to draft Reply (and Response)	4.20	2,730.00	

	Esq.		re: the pending Motions to address Defendants' conduct in violating the Agreement and Orders		
12/2/2024	Brian H. Pollock Esq.	Receipt, Review, and Analysis	Receipt and review of email from Ms. Perez that her client will be sending a check of \$25,000 towards the \$50,000 that remains due and payable	0.10	65.00
12/3/2024	Brian H. Pollock Esq.	Draft/review	Continue to conduct legal research, review file materials (including correspondence), and begin to draft Reply (and Response) re: the pending Motions to address Defendants' conduct in violating the Agreement and Orders	3.10	2,015.00
12/4/2024	Brian H. Pollock Esq.	Draft/review	Continue to conduct legal research, review file materials (including correspondence), and continue to draft Reply (and Response) re: the pending Motions to address Defendants' conduct in violating the Agreement and Orders; also, compile Exhibits (from emails) for same	0.50	325.00
12/19/2024	Brian H. Pollock Esq.	Receipt, Review, and Analysis	Receipt and review of Order to Show Cause to Magistrate Judge	0.10	65.00
12/20/2024	Brian H. Pollock Esq.	Receipt, Review, and Analysis	Receipt and review of Paperless Order Granting extension of time to respond to M/Default	0.10	65.00
1/28/2025	Brian H. Pollock Esq.	Receipt, Review, and Analysis	Receipt and review of Order / Notice of Improper Filing	0.31	201.50
1/31/2025	Brian H. Pollock Esq.	Receipt, Review, and Analysis	Receipt and review of the Letter/Correspondence by Ms. McKinnon	0.40	260.00
2/14/2025	Brian H. Pollock Esq.	Receipt, Review, and Analysis	Receipt and review of email from Ms. Perez re: her withdrawal from representation	0.20	130.00
2/19/2025	Brian H. Pollock Esq.	Receipt, Review, and Analysis	Receipt and review of the M/Wlthdraw filed by Ms. Perez	0.20	130.00
2/20/2025	Brian H. Pollock Esq.	Receipt, Review, and Analysis	Receipt and review of Order Deferring Ruling on M/Wlthdaw by Ms. Perez	0.10	65.00
2/21/2025	Brian H. Pollock Esq.	Receipt, Review, and Analysis	Receipt and review of N/Compliance and of the enclosed emails	0.30	195.00
3/5/2025	Brian H. Pollock Esq.	Receipt, Review, and Analysis	Receipt and review of MET to Retain Counsel	0.20	130.00
3/6/2025	Brian H. Pollock Esq.	Receipt, Review, and Analysis	Receipt and review of Order/Notice of Improper Filing	0.20	130.00
3/6/2025	Brian H. Pollock Esq.	Legal	Receipt of email from Mr. Gaitan; call him to discuss the potential for resolution and then draft email to him conveying an offer to resolve the remainder of this case	0.60	390.00
3/6/2025	Brian H. Pollock Esq.	Receipt, Review, and Analysis	Receipt and review of Order Granting MET to Retain Counsel	0.11	71.50
3/7/2025	Brian H. Pollock	Receipt, Review, and	Receipt and review of N/Compliance	0.10	65.00

	Esq.	Analysis				
3/7/2025	Brian H. Pollock Esq.	Email Communication	Exchange emails with Mr. Gaitan further to and in regard to the offer made	0.20	130.00	
3/10/2025	Brian H. Pollock Esq.	Email Communication	Exchange emails with Mr. Gaitan re: the terms of the offer conveyed by him and my response to it	0.50	325.00	
3/14/2025	Brian H. Pollock Esq.	Receipt, Review, and Analysis	Receipt and review of Order Granting M/WIthdraw by Ms. Perez	0.10	65.00	
3/14/2025	Brian H. Pollock Esq.	Receipt, Review, and Analysis	Receipt and review of N/Appearance by Mr. Hurkes	0.10	65.00	
3/17/2025	Brian H. Pollock Esq.	Receipt, Review, and Analysis	Receipt and review of Amended Order on M/Withdraw	0.10	65.00	
4/24/2025	Brian H. Pollock Esq.	Draft/review	Draft N/90 days expiring after reviewing the file for same	0.20	130.00	
5/28/2025	Brian H. Pollock Esq.	Email Communication	Exchange emails with Mr. Hooper, law clerk to Judge Hunt, re: the Court's hearing on the pending motions	0.20	130.00	
6/13/2025	Brian H. Pollock Esq.	Receipt, Review, and Analysis	Receipt and review of Paperless Order setting hearing on PI's M/Default Judgment, M/Order to Show Cause, M/Writ of Execution	0.10	65.00	
7/25/2025	Brian H. Pollock Esq.	Legal	Begin to prepare for hearing on our Motions (Final Judgment, Show Cause, and Writ of Execution) by compiling motions, responses, and law cited by the parties in preparation for the hearing	1.00	650.00	
7/25/2025	Brian H. Pollock Esq.	Receipt, Review, and Analysis	Exchange emails with defense counsel re: his request to continue the hearing and withdraw, respond with my opposition, and then receipt and review of email from defense counsel enclosing the Motion to Continue and Motion to Withdraw (which he could not file)	0.60	390.00	
7/27/2025	Brian H. Pollock Esq.	Draft/review	Draft comprehensive email identifying the chronology of events in the case to Mr. Hooper to address the defense counsel's request to continue the pending hearing and to withdraw from representing the Defendants and review file in preparation for drafting this (to keep the hearing on for tomorrow as scheduled, albeit by Zoom)	1.30	845.00	
7/27/2025	Brian H. Pollock Esq.	Email Communication	Receipt of email from defense counsel requesting to postpone the hearing and then review the file to draft a comprehensive response that identifies the filings at issue, the numerous attorneys who have appeared for the Defendants in this case, and to oppose a continuance and withdrawal	0.90	585.00	
7/28/2025	Brian H. Pollock Esq.	Attendance at	Continued preparation for and then attendance at the hearing on our Motions (for Default Final Judgment, Show Cause, and Writ of Execution);	1.40	910.00	
7/28/2025	Brian H. Pollock Esq.	Draft/review	Begin to conduct additional research and to draft the proposed Order (final judgment following today's hearing) as requested by Magistrate Judge Hunt	2.70	1,755.00	
7/28/2025	Brian H.	Receipt,	Receipt and review of Defense Counsel's M/Continuance	0.30	195.00	

	Pollock Esq.	Review, and Analysis	and M/Withdraw			
7/29/2025	Brian H. Pollock Esq.	Draft/review	Continue to revise and then finalize the proposed Order reflecting the rulings at yesterday's hearing and then draft email to Magistrate Judge Hunt re: and enclosing same	0.70	455.00	
7/31/2025	Brian H. Pollock Esq.	Receipt, Review, and Analysis	Receipt of email of Order deferring ruling on M/Withdraw	0.10	65.00	
8/1/2025	Brian H. Pollock Esq.	Receipt, Review, and Analysis	Receipt and review of the Report and Recommendation (following breach of Verified Agreement)	0.70	455.00	
8/11/2025	Brian H. Pollock Esq.	Draft/review	Begin to objection to R&R	1.10	715.00	
8/11/2025	Brian H. Pollock Esq.	Draft/review	Conduct legal research and then revise the draft of the Objection to the R&R	1.40	910.00	
8/12/2025	Brian H. Pollock Esq.	Draft/review	Further Revise Objection to R&R to align better with our argument - saved as v2	0.70	455.00	
8/12/2025	Brian H. Pollock Esq.	Draft/review	Conduct add'l legal research and further revise and then finalize our Objection to the R&R	0.80	520.00	
8/21/2025	Brian H. Pollock Esq.	Receipt, Review, and Analysis	Receipt and review of Order Denying Def Counsel's M/Withdraw	0.20	130.00	
8/22/2025	Brian H. Pollock Esq.	Receipt, Review, and Analysis	PAPERLESS ORDER denying Motion to Continue Hearing	0.10	65.00	
9/2/2025	Brian H. Pollock Esq.	Receipt, Review, and Analysis	Receipt and review of Order Adopting Report and Recommendations and Overruling Objections	0.30	195.00	
9/2/2025	Brian H. Pollock Esq.	Receipt, Review, and Analysis	Receipt and review of Final Judgment for Fees	0.10	65.00	
9/11/2025	Brian H. Pollock Esq.	Draft/review	Draft second Motion for Writ of Garnishment and proposed Writ of Garnishment (to reflect adjustments in amount of remaining award for recent Final Judgment entered by the Court)	0.60	390.00	
9/11/2025	Brian H. Pollock Esq.	Draft/review	Begin to draft and conduct legal/factual research for Motion for Fees Following Final Judgment (due to Defendants' breaches of the Settlement Agreement)	1.30	845.00	
9/15/2025	Brian H. Pollock Esq.	Draft/review	Continue to conduct legal research and then online research re: CPI and inflation for use in our M/Supplemental or Additional Fees and further revise it	1.40	910.00	
9/16/2025	Brian H. Pollock Esq.	Draft/review	Further revise and then finalize the M/Fees	0.50	325.00	

Services Subtotal:31,473.00

Notes:

Total:31,473.00

Please make all amounts payable to FairLaw Firm. Tax ID
No.: 20-1722656.

Payment is due upon receipt.

